

6. In addition, Defendant believes that an extension of the deadline for a responsive pleading will assist in providing additional time to investigate the matter and in filing a responsive pleading as well as attempt resolution of this matter.

7. An extension to May 18, 2022 will not prejudice any party at this early juncture.

WHEREFORE, Defendants respectfully requests that this Court enter an order extending time for it to file a responsive pleading to Plaintiffs' Complaint until May 18, 2022.

Dated this 25th day of April, 2022.

Respectfully submitted,
BARRON & NEWBURGER, PC

/s/Nabil G. Foster

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CERTIFICATE OF SERVICE

I, Nabil G. Foster, an attorney, certify that I shall cause to be served a copy of **Defendant LVNV Funding, LLC's Motion for Extension of Time to Respond to Complaint** upon the following individual(s), by deposit in the U.S. mail box postage prepaid, messenger delivery, Federal Express, facsimile transmitted from (312) 229-9203, or electronically via email or the Case Management/Electronic Case Filing System ("ECF") as indicated, on April 25, 2022.

<u> X </u>	CM/ECF	<i>Attorney for Plaintiff</i>
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